

**ULLMAN, FURHMAN & PLATT, P.C.**

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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LEAP SYSTEMS, INC.,

Plaintiff,

—*against*—

MONEYTRAX, INC., ESTATE OF  
NORMAN BAKER and PEGGY BAKER,

Defendants.

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TODD LANGFORD,

Intervenor.

Civil Action No. 05cv1521 (FLW)

**NOTICE OF MOTION TO  
INTERVENE AND TO VACATE OR  
MODIFY SEALING ORDER**

TO: All Counsel of Record:

**PLEASE TAKE NOTICE**, that Todd Langford will move this Honorable Court, before Hon. Freda L. Wolfson, U.S.D.J., at the United States Courthouse, 402 East State Street, Trenton, New Jersey, on July 6, 2009, at 9:00 AM, or as soon thereafter as counsel may be heard, for an order, pursuant to Rule 24, *Fed.R.Civ.Proc.*, and L.Civ.R. 5.3, permitting Todd Langford to intervene in this action for the purpose of moving to vacate or modify this Court's order, dated May 9, 2008, sealing the transcript of the recording of the settlement agreement among the original parties to the action, which took place on March 25, 2008, and granting such other, further or different relief


as to the Court may seem just and proper.

**PLEASE TAKE FURTHER NOTICE**, that in support of this motion, the movant will rely upon the accompanying Certification of Jeffrey D. Ullman, Esq., and the supporting Letter Brief submitted simultaneously herewith. Movant has also submitted an proposed form of order.

**PLEASE TAKE FURTHER NOTICE**, that if opposition is presented, the movant respectfully requests oral argument.

Respectfully submitted,

**ULLMAN, FURHMAN & PLATT, P.C.**

By:  \_\_\_\_\_  
Jeffrey D. Ullman  
A Member of the Firm

Dated: Morristown, New Jersey  
June 10, 2009